IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Criminal No. 16-243
Honorable Arthur J. Schwab

Protective Order

- Defense counsel shall not disclose the minor victims' impact statements and therapeutic treatment needs assessments to any person, except for defendant, for any reason whatsoever;
- 2. Regarding the transcripts of the minor victims' forensic interviews and/or statements:
 - a. Defense counsel agrees not to disclose the materials to any person except retained psychologists Barry Zakireh, Ph.D. and Elliot Atkins, Ed.D. and the following named associates and staff of the law offices of Alan Ellis: (defendant to provide);
 - b. Defense counsel, his associates and staff working as part of the defense team on the above-captioned case, and his retained psychologists shall:
 - not copy, duplicate or disseminate, or allow any other individual or entity to copy, duplicate, or disseminate any portion of the materials for any reason whatsoever at any time;

- ii. agree to maintain the materials in their possession and store them in a secure place to which no other person has access;
- iii. return all copies of the materials to counsel for the government within one week of the resolution of any post-trial motions.
- 3. Defense counsel shall make an application to the Court should he seek further disclosure to any person of any of the materials referenced in this order.

The Honorable Arthy A. Schwab

U.S. District Court Judge